

Office of Laboratory Licensure, Certification & Training

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Jane Dee Hull, Governor James R. Allen, MD, MPH, Director

Information Update

August 15, 1997 Update # 38

1. All the licensed laboratories should have received a letter dated July 25, 1997 along with a copy of our new Rules. All Arizona licensed laboratories must come into compliance with these new rules. Our office will allow a phase in time period for all laboratories until September 1, 1997 for a switch over of SOPs and Methodologies, listed in the new rules, to be in compliance with the new rules.

Arizona Laboratory Licensure does not require the laboratories to use SW-846 Update III for Arizona compliance testing until Arizona Laboratory licensure incorporates this Update into their rules. If a laboratory wishes to be certified for methods in Update III or for the methods that are not in the current rules, due to their clients needs, they will have to follow the procedure described in R9-14-608B (Arizona Laboratory Licensure Rules).

Arizona Laboratory Licensure will promulgate Update III after the promulgated version of Update III is mailed out to the environmental community by USEPA. The Arizona Laboratory Licensure Program will then go through a promulgation process of incorporating Update III into their rules. All the Arizona licensed laboratories will be informed through the Information Update when the Update III is promulgated in Arizona.

- 2. The following information was obtained from *Labcert Bulletin*, dated June 1997, published by USEPA, Office of Ground Water and Drinking Water, Cincinnati, Ohio.
 - a. Many in the laboratory community are aware that the EPA has been planning to externalize the water laboratory performance study program. The EPA has decided, after considering public comment, to enter into a Memorandum of Understanding (MOU) with National Institute of Standards and Technology (NIST). This MOU will delineate the role of NIST as the performance evaluation study provider accreditation authority and EPA's role as the standard setting authority. Details can be found in *Federal Register*, Vol. 61, No. 139, Thursday, July 18, 1996. The last EPA provided study will be shipped in 1998. For information, contact Donna Sirk @ (310) 975-3976, fax (310) 926-8671 or e-mail donna.sirk@nist.gov or call EPA's Safe Drinking Water Hotline @ (800) 426-4791, Monday through Friday from 9:00 a.m. to 5:30 p.m. eastern standard time.

- b. On January 4, 1995, revision 5.4 of USEPA Method 200.8, was promulgated for compliance monitoring of mercury in drinking water. However, Revision 5.4 can only be used for the determination of mercury by "direct Analysis" when an acid preserved sample has a turbidity of <1 NTU. Unfortunately, when this option (for the determination of mercury) was added to Method 200.8, Section 8.1, which addresses holding times, was not revised to include the required holding time limitation for mercury of 28 days (CFR 141.23). Please make a note of this restriction in your copy of Method 200.8. The holding time begins immediately following the completion of sample collection. For further information contact Ted Martin @ (513) 569-7312.</p>
- c. As most of you are aware by now, the long awaited radionuclide final rule was promulgated on March 5, 1997. This rule approved 66 additional radionuclide methods for compliance monitoring of drinking waters. The methods in the approved rule were originally proposed in July 1991. This rule does not withdraw any compliance methods previously approved nor does it change any MCLs or monitoring requirements for radionuclides. (None of these new methods are in the current Arizona Rules. If you would like be certified for these methods before they are incorporated into our rules see the reference in item # 1.)
- d. d. On March 28th, the first of two proposals that would radically change procedures for approving analytical methods for compliance monitoring under the Safe Drinking Water Act and Clean Water Act was published in the *Federal Register*. This proposal, which was developed by the drinking and wastewater programs and is called *Streamlining*, would allow immediate use of modifications to current compliance methods, and adopt a performance-based approach to approving new technologies for compliance monitoring. This proposal describes standardized QC procedures, method validation steps and acceptance criteria required to obtain approval of a new or modified method. It would reduce the need for Agency review of Alternate Test Procedures, because 95% of the caseload now involves review of method modifications. It would also eliminate the urgency to update the tables of approved methods in the *Code of Federal Regulations* when new versions of methods are published by EPA or organizations, such as AOAC, ASTM and Standard Methods. USEPA may also propose to extend this process to biological methods. A final rule is planned for 1998. This Streamlining process would be a first step towards a performance-based approach to environmental measurements.

This Streamlining process of Office of Water (OW) approach differs from the Performance-based methods system (PBMS) in the way it handles approval of new methods. OW would allow modified compliance methods to be used without notifications; however, new methods or technologies would continue to require formal Agency review because the QC procedures and acceptance criteria specified in regulations for that analyte may have to be adapted to the characteristics of the new technology. Under PBMS any method that meets the performance criteria for an analyte could be used for compliance monitoring without notifying the Agency.

- e. In September 1996, Office of Ground Water and Drinking Water approved *Colilert-18* to determine the presence or absence of total coliforms and *E. coli* in drinking water under the TCR (40 CFR 141.21) and to enumerate total coliforms in source water under the SWTR (40 CFR 141.74).
- f. Laboratories may use the *Quanti-Tray* tests to determine the presence or absence of total coliforms and E. coli in drinking water under the Total Coliform Rule (40 CFR 141.21).
- g. Millipore corporation, the manufacturer of Colisure medium has notified EPA that a change in

the manufacturing process of the *Colisure* medium has resulted in a granulated product which is visibly different from the original powder version. The formulation of the granulated product is the same as that approved for drinking water and surface water and the Office of ground Water and Drinking Water has determined that no additional approval is necessary.

- h. The Working Group on Waterborne Cryptosporidiosis has developed a publication, *Cryptosporidium and Water; A Public Health Handbook-1997*, to help state and local health departments and water utilities prepare for and respond to reports of *Cryptosporidium* in drinking water and source waters. The objectives of the Handbook are to provide tools for prevention and investigation of Cryptosporidium and other pathogen outbreaks. This document can be ordered from American Water Works Association @ 800-926-7337. The cost is \$20.00 for members and \$30.00 for non-members.
- 3. Web sites of interest and some important phone numbers:
 - Now you can visit EPA microbiology home page @ http://www.epa.gov/microbes.
 - http://www.epa.gov/ORD/whatsnew.htm ORD has a site in "Whatsnew" and lists the NERL manual of manuals.
 - The Safe Drinking Water Hotline as well as a E-mail Hotline can be found @ http://www.epa.gov/watrhome/pubs/drinklink.html. The Hot line phone number is: (800)-426-4791
 - The ICR site can be found @ http://www.epa.gov/OGWDW/icrsom.html
 - EPA Solid Waste Methods Information Communication and Exchange (MICE) has a new fax number (703) 698-6101 and an Internet email address <u>MICE@LAN828.EHSG.SAIC.com</u>. Your questions on SW 846 methods can be either faxed or e-mailed.
- 4. The National Environmental Laboratory Accreditation Conference(NELAC) is a voluntary association of states, federal agencies, and tribal governments established to develop national standards for environmental laboratory accreditation. Established in 1955, NELAC has up to this point been involved in creating an organizational framework and writing accreditation standards. A majority of the standards were adopted in July of 1997, following the third annual meeting of NELAC (NELAC III). The changes to the Proficiency Testing would be adopted as amendments in the future. You will be kept informed on the progress of NELAC through this Update.
- 5. Copies of all the information updates can be found on the ADHS Lab Licensure's <u>Technical Training</u> web site.
- 6. If you have any questions regarding the Updates, or if you have any technical questions that need clarification, please call or send <u>e-mail</u> to Prabha Acharya, Program Manager, Technical Resources and Training at the Laboratory Licensure. A <u>table of contents</u> to all the Information Updates published is also available.

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